

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION**

**DANIELLE SPEARS,**

**Plaintiff,**

**V.**

**NEXT BRIDGE HYDROCARBONS,  
INC., GREGORY MCCABE, JOHN  
BRDA, THE SECURITIES &  
EXCHANGE COMMISSION,  
FINANCIAL INDUSTRY  
REGULATORY AUTHORITY, JANE  
DOE 1-20, JOHN DO 1-20**

## Defendants.

**CASE NO. 24-cv-00321-DC-RCG**

**AGREED MOTION FOR EXTENSION OF TIME TO RESPOND  
TO THE SECOND AMENDED COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“FRCP”), Defendant Gregory McCabe (“McCabe”) requests a 45-day extension of time to May 12, 2025, to respond to Plaintiff’s Second Amended Complaint (ECF 13).

In support of this motion, McCabe states as follows:

1. This motion is McCabe's first request for an extension of time with respect to this response deadline.
2. Counsel for McCabe has conferred with pro se Plaintiff, Danielle Spears, and she agreed to extend the deadline to respond to the Second Amended Complaint to May 23, 2025. Defendants John Brda and the Securities and Exchange Commission are the only other parties to make appearances at this time.

3. McCabe requests additional time to prepare his response to the Second Amended Complaint because of its breadth and recent service of same. On March 14, 2025, Plaintiff filed her Second Amended Complaint which to date has not been properly served but is acknowledged herein. The Second Amended Complaint is 88 pages, contains 254 numbered allegations, asserts 9 counts, and seeks declaratory and injunctive relief on a multitude of statutory and constitutional bases.

WHEREFORE, McCabe respectfully moves for an extension of time from March 28, 2025, to and including May 12, 2025, to move to dismiss or otherwise respond to the Second Amended Complaint.

Respectfully submitted,

**SMITH CLARK PENNINGTON PLLC**  
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**ATTORNEYS FOR DEFENDANT**  
**GREG MCCABE**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of March 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

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*/s/ Jill C. Pennington*

Jill C. Pennington